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## UNITED STATES BANKRUPTCY COURT

## DISTRICT OF NEVADA

)Case No. BKS-18-16305-ABL )Chapter 13
) )Hearing Date: OST REQUESTED )Hearing Time: OST REQUESTED )
) ) )

## MOTION FOR CONTINUATION OF AUTOMATIC STAY TO ALL CREDITORS ON OST

Now Come, Kimberly Yavonne Bustamante (hereinafter the "Debtor"), through the law firm of HAINES & KRIEGER, L.L.C., and attorney George Haines, Esq., and moves this Court pursuant to 11 U.S.C. § 362(c)(3) for an Order continuing the automatic stay provided under §362(a) as to all creditors, and states:

- 1. Debtor filed the instant Chapter 13, Case Number 18-16305 on October 19, 2018.
- Debtor's previously filed a Chapter 13 Case No.17-12353 was dismissed September 17, 2018.
- 3. Debtors' previous Chapter 13 case #17-12353 was dismissed for failing to make their Chapter 13 payments.

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4. Unfortunately, the Debtor was only working part-time and was struggling financially

to satisfy all her obligations.

5. However, the Debtor has since retained full-time employment and her husband has

also received an increase in pay, therefore the Debtor feels confident she can afford

her plan payments.

6. The Debtor is fully aware of all their obligations and intend to fullfill their obligatons and

comply with his Chapter 13 plan. (See Affidavit of Kimberly Yavonne Bustamante).

7. The petition in the instant case was filed in good faith. Debtors believe that the

Chapter 13 Plan submitted will be confirmed and that the Debtor will be able to fully

perform under the terms of the Plan.

8. The Debtor's prior Chapter 13 case 18-16041 was dismissed in September 14, 2018,

was the only prior case by the Debtor that was pending during the year.

WHEREFORE, Debtors pray that this Court continues imposition of the automatic

stay under § 362(a) as to all creditors for the duration of this Chapter 13 proceeding, or until such

time as the stay is terminated under § 362(c)(1) or (c)(2) or a motion for relief is granted under §

362(d), and allow this motion to be heard on OST, prior to November 08, 2018.

Debtor further requests that LR 9021 be waived in the instant matter.

Dated: October 22, 2018

/s/George Haines, Esq. George Haines, Esq.

Attorney for Debtor(s)

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